

STEPHEN D. HANS  
& ASSOCIATES, P.C.  
LABOR & EMPLOYMENT COUNSEL FOR OVER 40 YEARS

30-30 Northern Blvd, Suite 401  
Long Island City, NY 11101

T: 718.275.6700 • F: 718.275.6704

MEMO ENDORSED

May 19, 2021

Hon. Ona T. Wang  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Nava Perez et al v. Karaviannis Global Group et al  
1:18-cv-10212-OTW

Dear Judge Wang:

I represent the Defendant's in the above matter. I write this letter with the full consent of the Plaintiff's counsel.

The Court ordered that the Agreement be finalized by 5:00pm today. The Plaintiff's counsel is new, and I did not recognize his name a few days ago. Moreover, my client executed the Agreement several months ago. I assumed counsel for the Plaintiff was going to submit that Agreement. My mistake.

I am now trying to reach my client to have him re-execute the latest agreement which I did not realize had to be done. My office has been challenging lately due to staff out and my secretary dealing with other effects of her COVID shot.

I would respectfully ask this Court for one week to get this fully executed and I will not sit on it.

SO ORDERED:

Application Granted. Extension to  
May 27, 2021.



Ona T. Wang 5/21/21  
United States Magistrate Judge

Respectfully Submitted,

By: \_\_\_\_\_/s/\_\_\_\_\_  
Stephen D. Hans (SH-0798)  
30-30 Northern Boulevard, Suite 401  
Long Island City, New York 11101  
Tel: 718.275.6700  
Fax: 718.275.6704  
Email: shans@hansassociates.com